135 Crossways Park Drive, Suite 201 Woodbury, NY 11797

Telephone: 516.681.1100

www.kaufmandolowich.com

Rashmee Sinha rsinha@kaufmandolowich.com

Solomon Abramov sabramov@kaufmandolowich.com

August 5, 2024

## **VIA ECF**

Honorable Judge Cathy L. Waldor, U.S.M.J U.S. District Court for the District of New Jersey Martin Luther King Building & U.S. Courthouse 50 Walnut Street Room 4040, Courtroom 4C Newark, New Jersey 07101

> Re: Maria Ramos Ramirez v. Empire Management Group LLC, Kaleh Mostafa,

and Theresa Sanchez Mostafa

Case No.: 2:24-cv-00121-MCA-CLW **Request for Settlement Conference** 

Dear Judge Waldor:

This firm represents Defendants, Empire Management Group LLC, Teresa Sanchez and Khaled Mostafa (collectively, the "Defendants"), in the above-captioned matter. We write jointly, with counsel for Plaintiff, Maria Ramos Ramirez ("Plaintiff"), to respectfully request a settlement conference with Your Honor.

The Parties have, in good faith, engaged in preliminary settlement discussions and believe that a conference facilitated by the Court would be beneficial to explore outstanding issues and potential avenues for a more prompt resolution. The Parties have also conferred and confirmed their availability to attend the settlement conference on any of the following dates subject to the Court's availability: 9/23, 9/24, 9/26, 9/27 and 9/30. The Parties are also prepared to provide any additional information that may assist the Court in scheduling and preparing for the conference.

We thank the Court for its kind consideration of this request.

Respectfully submitted,

KAUFMAN DOLOWICH LLP

Rashmee Sinha Solomon Abramov